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Attorneys for Plaintiff California Institute of Technology

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

CALIFORNIA INSTITUTE OF TECHNOLOGY,

Plaintiff,

V

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA,
INC.

Defendants.

Case No. 5:22-MC-80318-VKD

E.D. Tex. Case No. 2:21-CV-0446-JRG

**PLAINTIFF CALIFORNIA INSTITUTE
OF TECHNOLOGY'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER BROADCOM'S
MATERIAL SHOULD BE SEALED**

Date: January 10, 2023
San Jose Courthouse, Courtroom 2, 5th Floor
Time: 10:00 AM PT

**PLAINTIFF CALIFORNIA INSTITUTE OF TECHNOLOGY'S
ADMINISTRATIVE MOTION TO CONSIDER WHETHER
BROADCOM'S MATERIAL SHOULD BE SEALED**

Pursuant to Civil Local Rules 7-11 and 79-5(f), Plaintiff California Institute of Technology (“Caltech”) files this Administrative Motion to Consider Whether Broadcom’s Material Should be Sealed. On November 21, 2022, Caltech filed its Motion to Compel Subpoena Compliance by Broadcom. Dkt. 1. On December 19, 2022 Broadcom filed its opposition to that motion, and in connection with that opposition, it sought to file certain documents and portions of documents under seal. Dkt. 16 (Administrative Motion to File Under Seal); Dkt. 17 (public version of opposition filing). In its Reply in Support of its Motion to Compel Subpoena Compliance, Caltech quotes and/or describes various information from Broadcom’s opposition papers that Broadcom has sought to keep under seal. For these reasons, and in accordance with Local Rule 79-5(f), Caltech seeks to seal the following portions of its Reply:

- Page 4, Lines 20, 24, 25
- Page 5, Lines 6-7, 10

DATED: December 29, 2022

Respectfully submitted,

By: /s/ Ravi Bhalla
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on all counsel of record.

/s/ *Ravi Bhalla*

Ravi Bhalla